

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Steven Tursi  
Cristina Tursi

Case No.: 18-34145

Judge: CMG

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following **(choose one)**:

1. ☒ Motion for Relief from the Automatic Stay filed by Gateway Funding, creditor,

A hearing has been scheduled for November 6, 2019, at 9:00 a.m..

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☒ Payments have been made in the amount of \$ 1,500.00, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Debtors have brought payments current through October, 2019. Debtors didn't realize delinquency as they stopped receiving statements regular monthly statements after the filing of the bankruptcy. Debtors can continue regular monthly payments.

☒ Other (**explain your answer**):

Debtors would request that creditor resume sending regular monthly statements.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 10/22/19

/s/ Steven Tursi  
Debtor's Signature

Date: 10/22/19

/s/ Cristina Tursi  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.